

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

<div>In re:</div> <div>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</div> <div>as representative of</div> <div>THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i></div> <div>Debtors.<sup>1</sup></div>	<div>PROMESA Title III</div> <div>Case No. 17 BK 3283-LTS (Jointly Administered)</div>
<div>In re:</div> <div>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</div> <div>as representative of</div> <div>PUERTO RICO ELECTRIC POWER AUTHORITY,</div> <div>Debtor.</div>	<div>PROMESA Title III</div> <div>Case No. 17 BK 4780-LTS</div> <div>Re: ECF Nos. 815 (Case No. 17-4780), 2985 (Case No. 17-3283)</div>
<div>MASTER LINK CORPORATION,</div> <div>Movant,</div> <div>-against-</div> <div>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</div> <div>as representative of</div> <div>PUERTO RICO ELECTRIC POWER AUTHORITY,</div> <div>Respondent.</div>	<div><b>Motion in Compliance with Order Relates Only to PREPA and Shall Only be Filed in Case Nos. 17 BK 3283-LTS and 17 BK 4780- LTS</b></div>

<sup>1</sup> The Debtors in the jointly-administered Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

**JOINT MOTION IN COMPLIANCE WITH ORDER RELATED TO  
MASTER LINK CORPORATION'S MOTION FOR RELIEF OF STAY**

To the Honorable United States District Court Judge Laura Taylor Swain:

On behalf of the Puerto Rico Electric Power Authority (“PREPA”), the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”) pursuant to the authority granted to it under the *Enabling Act of the Fiscal Agency and Financial Advisory Authority*, Act 2-2017, and Movant, Masterlink Corporation (“ML”), respectfully submit this Joint Motion in Compliance with Order (the “Motion”). In support of the Motion, the parties respectfully state as follows:<sup>2</sup>

1. On July 16, 2018, this Court issued an order granting ML’s unopposed request for an extension of time to file a joint report and extended the deadline to July 25, 2018. [Dkt. No. 3524.] The joint report pertains to this Court’s order entered on May 1, 2018 (the “Initial Order”) concerning the parties’ “efforts to seek to develop a mutually acceptable resolution of the outstanding performance bond issue or, at minimum, an agreed statement regarding the nature and pendency of the stayed litigation that can be used in connection with inquiries as ML’s bids for business.” [Dkt. No. 2985 at 6.]

2. In compliance with the Initial Order, on July 25, 2018, the parties informed the Court of the efforts made by both parties to reach an agreement as related to the nature and pendency of the stayed litigation and ML’s concerns regarding the potential impact of the pending litigation in relation to its commercial prospects with PREPA. [Dkt. No. 3696]

3. On August 27, 2018 the parties further informed the Court that the parties were in communication and still in the process of discussing possible alternatives and drafting a mutually acceptable statement.

---

<sup>2</sup> The Financial Oversight and Management Board for Puerto Rico, as the Debtors’ representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”), has authorized AAFAF to join in this Motion on behalf of PREPA.

4. On August 30, 2018, the parties met to further discuss alternatives to resolve the pending issues between them and scheduled a meeting for the week of September 10-14, 2018 to follow up on the discussions had. Accordingly, the parties respectfully request that the parties provide the Court a joint status report on these additional efforts on or before October 7, 2018.

**RESPECTFULLY SUBMITTED.**

**I HEREBY CERTIFY** that on this date, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record.

In San Juan, Puerto Rico, this 7<sup>th</sup> of September, 2018.

**THE PUERTO RICO FISCAL  
AGENCY AND FINANCIAL  
ADVISORY AUTHORITY, as Fiscal  
Agent for PREPA**

By its attorneys,

/s/ Kevin D. Finger

Kevin D. Finger (*admitted pro hac vice*)  
David D. Cleary (*admitted pro hac vice*)  
Greenberg Traurig, LLP  
77 West Wacker Drive Suite 3100  
Chicago, IL 60601  
Phone: 312.456.8400  
Fax: 312.456.8435  
Email: fingerk@gtlaw.com  
clearyd@gtlaw.com

**MOVANTS MASTERLINK**

S/Henry Vázquez Irizarry  
USDC No. 205011  
Bufete Vázquez  
Irizarry, CSP Urb.  
Villa Fontana Park  
Calle Parque Luis M. Rivera  
5 HH6 Carolina, PR 00983  
Tel. (787) 724-7514 / 787-645-2241  
Fax (888) 518-1318

Nathan A. Haynes (*admitted pro hac vice*) Greenberg Traurig, LLP  
200 Park Avenue  
New York, NY 10166  
Phone: 212.801.9200  
Fax: 212.801.6400  
Email: mitchelln@gtlaw.com  
haynesn@gtlaw.com

Joseph P. Davis (*admitted pro hac vice*)  
Greenberg Traurig, LLP  
One International Place, Suite 2000  
Boston, MA 02110  
Phone: 617.310.6000  
Fax: 617.310.6001  
Email: davisjo@gtlaw.com

**THE PUERTO RICO ELECTRIC  
POWER AUTHORITY**

By its attorneys,

/s/ Arturo Díaz Angueria  
USDC No. 117907

/s/ Katuska Bolaños Lugo  
USDC No. 231812  
CANCIO, NADAL, RIVERA & DÍAZ,  
P.S.C.  
PO Box 364966  
San Juan, PR 00936-4966  
Phone: (787) 767-9625  
Fax: (787) 764-4430  
Email: adiaz@cnrd.com  
kbolanos@cnrd.com